

FILED

1 MOHAMAD YASSIN ALCHARIHI
2 36811 45th Street East
3 Palmdale, California 93552
4 Phone: 818.915.2649
Email: midan2020@yahoo.com

2018 JUL 13 PM 3:33

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Plaintiff in Pro Per

10 UNITED STATES OF AMERICA,) CASE NO.: 2:18-CV-04420
11)
12 Plaintiff,)
13)
14)
15 vs.)
16)
17 ANCIENT MOSAIC,)
18)
19 Defendant.)
20)
21)
22)
23)
24)
25)
26)
27)
28)

)
) NOTICE OF MOTION AND MOTION
) OF MOHAMAD YASSIN ALCHARIHI
) TO DISMISS THE VERIFIED
) COMPLAINT OF THE UNITED
) STATES GOVERNMENT;
) MEMORANDUM OF POINTS AND
) AUTHORITIES IN SUPPORT
) THEREOF

)
Date: Mon Sep 10th 2018
Time: 1000 AM
Courtroom: SA

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT:** on __, 2018 at _____, in Courtroom

3 _____ of the above-entitled Court located at _____ Claimant

4 MOHAMAD YASSIN ALCHARIHI, will move this Court for an Order to Dismiss the
5 this matter pursuant to Federal Rules of Civil Procedure, 12(b)(6) and Federal Rules of
6 Civil Procedure, Supplemental Rule G(8)(b)(i), dismissing Plaintiff United States of
7 America's Verified Complaint for Forfeiture on the grounds that the Complaint fails to
8 state a claim upon which relief can be granted.

9 This Motion is based on this Notice of Motion and Motion, the accompanying
10 Memorandum of Points and Authorities, the records and files of this Court, any matters
11 of which the Court may take judicial notice, and such further evidence and argument as
12 may be presented at or before the hearing on this matter.

13 This motion is made following the conference of counsel pursuant to L.R. 7-3,
14 which took place on _____.

15 Dated: July 11, 2018

16 Respectfully,

17 _____
18 MOHAMAD YASSIN ALCHARIHI

19 Plaintiff, in Pro Per

MEMORANDUM OF POINTS AND AUTHORITIES

When examined in light of the Supplemental Rule's requirements of "particularity" in "sufficiently detailed facts to support a reasonable belief that the government will be able to meet its burden of proof at trial" - "to establish, by a preponderance of the evidence, that the property is subject to forfeiture," it is clear that the Verified Complaint, fails.

This is a forfeiture action brought by the United States of America, in its delayed effort to seize what it terms an “Ancient Mosaic” which is more descriptively known as a 2000-Year-Old Roman Era Mosaic of Hercules.

The Plaintiff the United States Government makes this claim without due process to any potential claimant, and in particular MOHAMAD YASSIN ALCHARIHI, by its failure to timely file its Complaint pursuant to 18 U.S.C. § 981(a)(1)(A) and (C), despite numerous continuances.

Under civil forfeiture statutes, the government can only lawfully forfeit property if the government *specifically* traces the property to unlawful activity. The government may not rely on general or conclusory allegations of traceability. Here, as evidenced by the Government's continued delays, it has manifestly failed to uncover any actual tracing of the proceeds of unlawful activity to the property seized.

The civil forfeiture *in rem* provides the government with a powerful tool to effectuate an immediate deprivation of property, pleading requirements under the Supplemental Rules are more stringent than the general pleading requirements found in the Federal Rules of Civil Procedure.

I. SUMMARY OF FACTS¹

Claimant in these proceedings, MOHAMAD YASSIN ALCHARIHI is a resident of Palmdale, California.

¹ See, MOHAMAD YASSIN ALCHARIHI's Verified Claim, concurrently filed herewith.

1 MOHAMAD YASSIN ALCHARIHI, is the sole individual owner of the
2 ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old Roman Era
3 Mosaic of Hercules - the 11th Trial of Hercules.

4 The ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old
5 Roman Era Mosaic of Hercules, was imported as trash and restored to value by the
6 Claimant, MOHAMAD YASSIN ALCHARIHI, spending over \$40,000 for the
7 technique of restoration and preservation.

8 The ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old
9 Roman Era Mosaic of Hercules, popularly described in the antiquities industry as "The
10 Eleventh Labor of Hercules" is a famous Mosaic in the history of Greek mythology
11 that was damaged and in no condition to be displayed or shown to viewers as an item
12 in a museum or other display venue.

13 MOHAMAD YASSIN ALCHARIHI paid for the importation of the ANCIENT
14 MOSAIC, more descriptively known as a 2000-Year-Old Roman Era Mosaic of
15 Hercules.

16 MOHAMAD YASSIN ALCHARIHI has all necessary documentation of
17 ownership for the ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old
18 Roman Era Mosaic of Hercules.

19 The ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old
20 Roman Era Mosaic of Hercules, is a "Turkish Mosaic."

21 MOHAMAD YASSIN ALCHARIHI has an invoice for the purchase of the
22 ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old Roman Era
23 Mosaic of Hercules.

24 The invoice was written in Turkish and English and listed the business that sold
25 the ANCIENT MOSAIC, more descriptively known as a 2000-Year-Old Roman Era
26 Mosaic of Hercules, to Claimant MOHAMAD YASSIN ALCHARIHI as "Ahmet
27 Bostanci" with an address in a province in Turkey.

28 The invoice included a statement: "We Hereby declare and Certify that the

1 contents covered by this receipt are all Turkish origin and has nothing to do whit [sic]
2 Syria what so ever."

3 Additionally, MOHAMAD YASSIN ALCHARIHI has a copy of a Certificate of
4 Origin reflecting Turkey as the country of origin of the ANCIENT MOSAIC, more
5 descriptively known as a 2000-Year-Old Roman Era Mosaic of Hercules.

6 Further, no probable cause existed for the seizure of his property and such
7 property was unlawfully seized.

8

9 **II. LEGAL ANALYSIS**

10 The Federal Rules of Civil Procedure Supplemental Rules and Asset Forfeiture
11 Actions, provide the pleading standard for this action. Under Supplemental Rule E,
12 which applies to an action *in rem*, "the complaint shall state the circumstances from
13 which the claim arises with such particularity that the defendant or claimant will be
14 able, without moving for a more definite statement, to commence an investigation of
15 the facts and to frame a responsive pleading." (*Fed. R. Civ. P. Supp. R. E(2)(a)*.)

16 Additionally, Supplemental Rule G requires that a complaint for civil forfeiture
17 must "state sufficiently detailed facts to support a reasonable belief that the
18 government will be able to meet its burden of proof at trial." (*Fed. R. Civ. P. Supp.*
19 *R. G(2)(f)*.) More succinctly, that the Plaintiff will be able "to establish, by a
20 preponderance of the evidence, that the property is subject to forfeiture." (18 U.S.C. §
21 983(c)(1).)

22 **A. PLAINTIFF – HAS A HEIGHTENED PLEADING STANDARD.**

23 The Supplemental Rules impose a heightened rigorous standard whilst pleading
24 its case at the initial stage. More than the pleading requirements of Federal Rules of
25 Civil Procedure, Rule 8-a which bears a heightened particularity-in-pleading
26 requirement. (*United States vs. All Assets Held at Bank Julius Baer & Co.*, 571 F.
27 Supp. 2d 1, 16 (D.D.C. 2008) (*All Assets*) ("The Court agrees with Claimants that Rule
28 G (and its predecessor Rule E(2)) creates a heightened burden for pleading on the

plaintiff.”); *United States vs. Daccarett*, 6 F.3d 37, 47 (2d Cir. 1993) (*Daccarett*) (“These standards [under the Supplemental Rules] are more stringent than the general pleading requirements set forth in the Federal Rules of Civil Procedure, an implicit accommodation to the drastic nature of the civil forfeiture remedy.”) (internal citation omitted); *United States vs. Real Property Located at 2323 Charms Road, Milford Tp., Oakland*, 946 F.2d 437, 440-41 (6th Cir. 1991) (*Charms Road*).)

This heightened standard is “an implicit accommodation to the drastic nature of the civil forfeiture remedy.” (*Daccarett* at 47; *All Assets* at 16 (“The additional burden of pleading requiring ‘added specifics is thought appropriate because of the drastic nature of those remedies.) This requirement acts as a buttress to the procedural due-process protections against improper use of these remedies.

The Verified Complaint fails to establish this contention, and must therefore be dismissed.

B. THE COMPLAINT FAILS THE PLAUSIBILITY STANDARD.

The complaint must also conform to the Supreme Court's plausibility standard. It is no longer the case that “a complaint should not be dismissed for failure to state a claim unless it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.” (*Bell Atl. Corp. vs. Twombly*, 550 U.S. 544, 546 (2007) (*Twombly*) (quoting *Conley vs. Gibson*, 355 U.S. 41, 45-46 (1957) (*Conley*)). Rather, to survive a motion to dismiss, a complaint must allege “sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face.” (*Ashcroft vs. Iqbal*, 129 S. Ct. 1937, 1949 (2009) (*Iqbal*)).

To determine whether a complaint is sufficient, the court first identifies mere legal conclusions within the complaint and disregards them because they are “not entitled to be assumed true.” (*Iqbal* at 1949-51.) Second, the court is to take the remaining well-pleaded and non-conclusory factual allegations (the “nub” of the complaint) and determine whether those allegations, standing alone, suffice to state a plausible claim for relief. (*Iqbal*.)

1 Applying this approach, the Verified Complaint seeking forfeiture of the
 2 defendant *in rem* clearly fails to satisfy the legally required pleading standards. As
 3 discussed herein, the Verified Complaint contains mostly, and only, conclusory
 4 allegations that fail both notice requirements, due process, let alone the requirement of
 5 particularity in stating sufficiently detailed facts to support a reasonable belief that the
 6 Government will be able to meet its burden. Accordingly, the Complaint should be
 7 dismissed pursuant to Federal Rules of Civil Procedure, Rule 12(b)(6).

8 The Verified Complaint fails to establish this contention, and must therefore be
 9 dismissed.

10 **C. THE CIVIL ASSET FORFEITURE REFORM ACT (“CAFRA”).**

11 The Civil Asset Forfeiture Reform Act (“CAFRA”) establishes strict deadlines
 12 relating to property seized by the government. Under CAFRA, the government has
 13 sixty days after seizing property to send written notice to interested parties. (18 U.S.C.
 14 § 983(a)(1)(A).) A Claimant in this action, MOHAMAD YASSIN ALCHARIHI,
 15 thereafter has limited time to file an administrative claim requesting return of the
 16 property. (*Id.*, § 983(a)(2).) Once the government receives a timely claim, it must file a
 17 complaint for forfeiture against the property within 90 days. (*Id.*, 983(a)(3)(A).)

18 Here the facts a very clear, Claimant, MOHAMAD YASSIN ALCHARIHI
 19 timely filed an administrative claim, and the government chose not to file a judicial
 20 complaint within the 90-day deadline. The law is clear under these circumstances, that
 21 the “the court shall order the return of the conveyance to the owner and the forfeiture
 22 may not take place. The statute leaves no room for district court discretion... the only
 23 authority the district court retains over the conveyance is to order its return and prevent
 24 any forfeiture from taking place.” (*U.S. vs. Indoor Cultivation Equipment from High*
 25 *Tech Indoor Garden Supply*, 55 F.3d 1311, 1317 (7th Cir. 1995).)

26 And yet, the Plaintiff, wrongfully retained the property, it now attempts to seize
 27 by way of these proceedings. The Verified Complaint must therefore be dismissed.

28 **1. *The Verified Complaint Fails to Sufficiently State Factual***

Allegations to Satisfy the Forfeiture Statutes.

Without particularized and precise allegations of specific conduct, the Complaint does not “state the circumstances from which the claim arises with such particularity that the defendant or claimant will be able, without moving for a more definite statement, to commence an investigation of the facts and to frame a responsive pleading.” *Fed. R. Civ. P. Supp. R. E(2)(a)*. Without more than this rote recital and vague, disconnected factual allegations. The Complaint fails to state a plausible claim while it does not even allege the particular, specific, conduct applied to the statutory scheme that allegedly forms the basis for forfeiture. “Where a complaint pleads facts that are merely consistent with a defendant’s liability, it stops short of the line between possibility and plausibility of entitlement to relief.” (*Iqbal* at 1949.)

12 The Verified Complaint fails to establish this contention, and must therefore be
13 dismissed.

2. Plaintiff, Cannot Meet the Minimum Standards

15 Further, Plaintiff fails to establish every necessary element, including
16 “knowledge.”

17 Plaintiff would need to prove that Claimant had either knowledge that the
18 transaction and his resulting actions were a form of unlawful activity, or that
19 MOHAMAD YASSIN ALCHARIHI had the requisite *intent* to promote or carry on
20 the specified unlawful activity. The Verified Complaint fails to state, with particularity,
21 sufficiently detailed facts to support a reasonable belief that the Plaintiff will be able to
22 establish, by a preponderance of the evidence, that the defendant *in rem* is criminally-
23 derived property and that MOHAMAD YASSIN ALCHARIHI engaged (or attempted
24 to engage) in the transaction with such *knowledge*, and that such transaction occurred
25 in the United States.

Further, “[f]orfeiture statutes are strictly construed against the government,” *United States vs. \$191.910.00 in U.S. Currency*, 16 F.3d 1051, 1068 (9th Cir. 1994) (citing *United States vs. One 1936 Model Ford V-8 Deluxe Coach*, 307 U.S. 219, 226,

1 59 S. Ct. 861, 864 (1939), and courts are “reluctant to find that a statute allows
 2 forfeiture where a plausible interpretation of the statute would not allow it,”
 3 *\$191.910.00 in U.S. Currency*, 16 F.3d at 1068. Moreover, courts are “particularly
 4 wary of civil forfeiture statutes, for they impose ‘quasi-criminal’ penalties without
 5 affording property owners all of the procedural protections afforded criminal
 6 defendants.” (, “*\$191.910.00 in U.S. Currency*.”)

7 Plaintiff cannot trace the “Defendant” to unlawful activity. Courts have
 8 routinely invalidated government forfeitures where the government failed to satisfy its
 9 burden of tracing purported criminal proceeds to criminal conduct. (*United States vs.*
 10 *\$506.231 in United States Currency*, 125 F.3d 442, 452 (7th Cir. 1997) (“The existence
 11 of any sum of money, standing alone, is not enough to establish probable cause to
 12 believe the money is forfeitable.”); *United States vs. Contents of Four Bank Accounts*,
 13 330 F. Supp. 2d 1299, 1304 (M.D. Ala. 2004) (“When the government seizes property
 14 under § 981, it must prove that the property is itself involved in, or is traceable to
 15 property involved in, a proscribed transaction.”); *United States vs. Contents in Account*
 16 *No. 059-644190-69*, 253 F. Supp. 2d 789, 797 (D. Vt. 2003) (“A bald assertion that an
 17 additional [monetary amount] is directly traceable to LCCP [the owner of seized
 18 funds], without a more fulsome description of the transactions involved, cannot create
 19 probable cause that these funds are, in fact, traceable to LCCP.”); *United States vs. All*
 20 *Funds Presently on Deposit or Attempted to Be Deposited in Any Accounts Maintained*
 21 *at American Express Bank*, 832 F. Supp. 542, 565 (E.D.N.Y. 1993) (denying forfeiture
 22 as to one claimant where the government’s allegations failed to rise above “mere
 23 suspicion.”).

24 The Verified Complaint fails to establish this contention, and must therefore be
 25 dismissed.

26 **D. PLAINTIFF’S 19 U.S.C. § 1595a(c)(1)(A) CLAIM FAILS**

27 In the Verified Complaint, the Plaintiff alludes to its longstanding investigation
 28 of ALCHARIHI engaged (or attempted to engage) in the transaction with such, without

1 any actual, factual proof. In sum, the statement is nothing more than a legal opinion
2 and conclusions that gives little credence to establishing the necessary link to a claim
3 under § 1595a(c)(1)(A). Those alleged investigations do not establish unlawful
4 importation in this matter – the statement is inflammatory and prejudicial, and has no
5 evidentiary basis.

6 The Verified Complaint must therefore be dismissed.
7

8 **III. CONCLUSION**

9 Plaintiffs bare legal conclusions cast as factual allegations that MOHAMAD
10 YASSIN ALCHARIHI violated the law, must be set aside and cannot be as accepted as
11 true (*Iqbal* at 1949-51.) This resulting in a Verified Complaint which is nothing but
12 vague allegations of *alleged* misconduct established through surreptitious and
13 unidentified witnesses with neither a nexus to the Mosaic or MOHAMAD YASSIN
14 ALCHARIHI. Plaintiff fails to advance an adequate application to the statutory
15 scheme which allegedly forms the basis for forfeiture. To survive a motion to dismiss,
16 requires Plaintiff to advance “more than an unadorned, the defendant-unlawfully” did
17 harm.” (*Iqbal* at 1949.)

18 Caution in this case is warranted inasmuch as “Government confiscation of
19 private property is disfavored in our constitutional system.” (*United States vs.*
20 *\$191,910.00 in U.S. Currency*, 16 F.3d 1051, 1068 (9th Cir. 1994), *superseded on*
21 *other grounds* as stated in *United States vs. \$80,010 in U.S. Currency*, 303 F.3d 1182,
22 1184 (9th Cir. 2002) (“CAFRA transferred the burden of proof from the claimant to the
23 government and required the government to establish forfeiture by a preponderance of
24 the evidence rather than by the lower probable cause standard.”); *see also United*
25 *States vs. All Assets of Statewide Auto Parts, Inc.*, 971 F.2d 896, 905 (2d Cir.
26 1992) (“We continue to be enormously troubled by the government’s increasing and
27 virtually unchecked use of the civil forfeiture statutes and the disregard for due process
28 that is buried in those statutes.”). Indeed, courts are “particularly wary of civil

1 forfeiture statutes, for they impose ‘quasi-criminal’ penalties without affording
2 property owners all of the procedural protections afforded criminal defendants.”
3 (*\$191,910.00 in U.S. Currency*, 16 F.3d at 1068. Accordingly, courts are “reluctant to
4 find that a statute allows forfeiture where a plausible interpretation of the statute would
5 not allow it.” (*191,910.00 in U.S. Currency* citing *United States vs. One 1936 Model*
6 *Ford V-8 Deluxe Coach*, 307 U.S. 219, 226 (1939)); *see also United States vs.*
7 *Marolf*, 173 F. 3d 1213 (9th Cir. 1999) (“[F]orfeitures should be enforced only when
8 within both the letter and spirit of the law.”).

9 Therefore, the Verified Complaint must be dismissed.

10
11
12 Dated: July 11, 2018

13 Respectfully,



14 MOHAMAD YASSIN ALCHARIHI

15
16 Plaintiff, in Pro Per

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Subject: Fwd: United States of America v. One Ancient Mosaic

From: kcohanesq@gmail.com
To: brwilliams3@gmail.com; lastresource1@aol.com; Dsrealty@yahoo.com
Date: Friday, July 13, 2018, 9:32:47 AM PDT

Please add as an exhibit

----- Forwarded message -----

From: **Schonbachler, Katie (USACAC)** <Katie.Schonbachler@usdoj.gov>
Date: Fri, Jul 13, 2018, 9:30 AM
Subject: RE: United States of America v. One Ancient Mosaic
To: Kat Cohan <kcohanesq@gmail.com>
Cc: Williams, Mark (USACAC) <Mark.A.Williams@usdoj.gov>

Ms. Cohan:

As previously discussed, the government will not agree to release the mosaic to your client.

And as a reminder, since you did not obtain an extension of the deadlines to file a claim and answer, today remains the deadline to file a claim.

The government is still agreeable to your extension request, but it is required that the parties file a Stipulation which I provided you a draft of on June 19th and 25th.

The Stipulation would need to be filed today before the deadline expires. Please let me know **before Noon today** if you authorize my office to add your electronic /s/ signature to the Stipulation.

Best regards,

Katie Schonbachler
Assistant United States Attorney
U.S. Attorney's Office
312 North Spring Street
Los Angeles, CA 90012
Tel: 213-894-3172
Fax: 213-894-7177

From: Kat Cohan <kcohanesq@gmail.com>
Sent: Friday, July 13, 2018 9:07 AM
To: Schonbachler, Katie (USACAC) <kschonbachler@usa.doj.gov>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: Re: United States of America v. One Ancient Mosaic

MEET AND CONFERRING BEFORE DEFENDANT FILES HIS MOTION TO DISMISS

Dear Ms. Schonbachler,

After reviewing the complaint, my client and I believe that there's no basis for the forfeiture and respectfully request that plaintiff return his item to defendant and dismiss the case.

12

Please advise by July 13, 2018 by 2:00 PM if plaintiff will grant this request.

Thank you,

Katherine Cohan,
Attorney for Def. Limited scope

On Mon, Jul 9, 2018, 11:35 AM Schonbachler, Katie (USACAC) <Katie.Schonbachler@usdoj.gov> wrote:

Yes.

From: Kat Cohan <kcohanresq@gmail.com>
Sent: Monday, July 09, 2018 11:19 AM
To: Schonbachler, Katie (USACAC) <kschonbachler@usa.doj.gov>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: Re: United States of America v. One Ancient Mosaic

Thank you Katie. Can I let you know by Wednesday please?

On Mon, Jul 9, 2018, 11:15 AM Schonbachler, Katie (USACAC) <Katie.Schonbachler@usdoj.gov> wrote:

Good Morning Kat:

As you know, your client's deadline to file a claim is this week. You previously requested an extension of that deadline which the government agreed to, but in order for your client to get the extension, the parties must file a Stipulation with the Court before the deadline.

I sent you the draft Stipulation on June 19th and June 25th but have not heard back. If your client still would like an extension, you will need to email me the signature page of the Stipulation or you can also email me that you authorize my office to add your electronic signature for filing. Please let me know by tomorrow.

Thank you

Katie Schonbachler
Assistant United States Attorney
U.S. Attorney's Office
312 North Spring Street
Los Angeles, CA 90012
Tel: 213-894-3172
Fax: 213-894-7177

Exhibit

From: Schonbachler, Katie (USACAC)
Sent: Monday, June 25, 2018 10:04 AM
To: 'Kat Cohan' <kcohanesq@gmail.com>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: RE: United States of America v. One Ancient Mosaic

Good Morning,

If the attached Stipulation meets your approval, please let me know if you authorize my office to add your electronic signature for filing.

Today I am also mailing you a copy of the notice letter with enclosures that the government sent to your client on June 8 before you notified us that you are his new attorney.

Thank you,

Katie

From: Schonbachler, Katie (USACAC)
Sent: Tuesday, June 19, 2018 3:15 PM
To: 'Kat Cohan' <kcohanesq@gmail.com>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: RE: United States of America v. One Ancient Mosaic

Good Afternoon,

Attached is the draft Stipulation. If it meets your approval, please email me scanned signature for filing.

For Thursday, please come to 13th floor of the courthouse.

If you want us to review the documents you mentioned before the meeting, you can email to Mark and I tomorrow.

Best regards,

Katie

From: Kat Cohan <kcohanesq@gmail.com>
Sent: Tuesday, June 19, 2018 10:51 AM
To: Schonbachler, Katie (USACAC) <kschonbachler@usa.doj.gov>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: Re: United States of America v. One Ancient Mosaic

Please see below...

On Tue, Jun 19, 2018, 10:38 AM Schonbachler, Katie (USACAC) <Katie.Schonbachler@usdoj.gov> wrote:

Katherine:

It was nice speaking with you today.

Pleasure speaking with you as well.

Please send me your contact information for me to add to a Stipulation for the extension you requested: Your Full name, law firm name, address, etc.

Law Offices of Katherine Cohan, APLC 9454 WILSHIRE BLVD PENTHOUSE SUITES, BEVERLY HILLS, CA. 90212

Per our telephone call today, feel free to email me the records you would like us to review and we are also agreeable to setting up a convenient time to meet with you and your client. Would you two be available this Thursday at 2pm to meet at our office?

YES !

Our office is located at U.S. Federal Courthouse (which is also now shared with L.A. Superior Court) address is 312 North Spring Street Los Angeles, CA 90012. Corner of Spring and Temple.

Is there a Dept or room number?

Thank you.

Thank you! Katherine

Katie

From: Kat Cohan <kcohanesq@gmail.com>
Sent: Monday, June 18, 2018 10:44 AM
To: Schonbachler, Katie (USACAC) <kschonbachler@usa.doj.gov>
Cc: Williams, Mark (USACAC) <MWilliams6@usa.doj.gov>
Subject: Re: United States of America v. One Ancient Mosaic

Good morning,

Yes, I am representing him on limited scope. Please feel free to call me on my cell, 310-625-4002.

Katherine

On Mon, Jun 18, 2018, 9:48 AM Schonbachler, Katie (USACAC) <Katie.Schonbachler@usdoj.gov> wrote:

Good Morning:

I received a voicemail message from you last week indicating that you represent Mr. Alcharihi in the above referenced matter.

I'm looping in AUSA Mark Williams who is lead counsel in the ongoing criminal investigation. We would be happy to set up a time to speak with you this week.

Can you kindly send us an email confirmation that you represent Mr. Alcharihi before we speak and then we can schedule a time for a call – possibly on Tuesday?

Best regards,

Katie Schonbachler

Assistant United States Attorney

U.S. Attorney's Office

312 North Spring Street

Los Angeles, CA 90012

Tel: 213-894-3172

Fax: 213-894-7177